

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

17CV540

TYQUAN HASKINS

Write the full name of each plaintiff.

No. _____

(To be filled out by Clerk's Office)

-against-

COMPLAINT

(Prisoner)

The People of the State of New

York etc... all in ~~the~~ individual

Capacity A.D.A. Michelle Sophia,

Gordon, Buzza, Hurwitz, etc... & official capacity.

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section IV.

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NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. LEGAL BASIS FOR CLAIM

State below the federal legal basis for your claim, if known. This form is designed primarily for prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

☒ Violation of my federal constitutional rights

☐ Other:

6, 4, 5, 6, 8, 14 Amendments Violated

II. PLAINTIFF INFORMATION

Each plaintiff must provide the following information. Attach additional pages if necessary.

TYQUAN

First Name

J

Middle Initial

HASKINS

Last Name

State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.

BK#349-16-09361 NYSID

Prisoner ID # (if you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)

Anna M. Krass Center

Current Place of Detention

18-18 Hazen Street

Institutional Address

East Elmhurst

County, City

N.Y.

State

11376

Zip Code

III. PRISONER STATUS

Indicate below whether you are a prisoner or other confined person:

☒ Pretrial detainee

☐ Civilly committed detainee

☐ Immigration detainee

☐ Convicted and sentenced prisoner

☐ Other: _____

IV. DEFENDANT INFORMATION

To the best of your ability, provide the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are identical to those listed in the caption. Attach additional pages as necessary.

Defendant 1:	<u>Adam</u>	<u>Tegan</u>	<u>7192</u>
	First Name	Last Name	Shield #
	<u>Detective</u>		
	Current Job Title (or other identifying information)		
	<u>Detective squad 33rd Precinct</u>		
	Current Work Address		
	<u>New York</u>	<u>N.Y.</u>	<u>33rd Precinct</u>
	County, City	State	Zip Code
Defendant 2:	<u>Gordon</u>	<u>Ludwig</u>	<u>ESQ</u>
	First Name	Last Name	Shield #
	<u>Legal Aid</u>		
	Current Job Title (or other identifying information)		
	<u>45 Thomas Street</u>		
	Current Work Address		
	<u>New York</u>	<u>N.Y.</u>	<u>10013</u>
	County, City	State	Zip Code
Defendant 3:	<u>Sophia</u>	<u>Khan</u>	<u>A.D.A</u>
	First Name	Last Name	Shield #
	<u>ASSISTING DISTRICT ATTORNEY</u>		
	Current Job Title (or other identifying information)		
	<u>One Hogan Place</u>		
	Current Work Address		
	<u>New York</u>	<u>N.Y.</u>	<u>10013</u>
	County, City	State	Zip Code
Defendant 4:	<u>John</u>	<u>Bazza</u>	<u>P. C.</u>
	First Name	Last Name	Shield #
	<u>LAW OFFICE OF John BAZZA</u>		
	Current Job Title (or other identifying information)		
	<u>20 Vesey Street</u>		
	Current Work Address		
	<u>New York</u>	<u>N.Y.</u>	<u>10007</u>
	County, City	State	Zip Code

V. STATEMENT OF CLAIM

1. 265 E 161 St 2. 100 Centre St
 Place(s) of occurrence: Bronx N.Y. 10451 New York N.Y. 10013

1. 265 E 161 St 2. 100 Centre St 8/26/16 9/1/16
 4th floor 8/30/16 9/19/16
 Date(s) of occurrence: Bronx N.Y. 10451 8/25/2016 New York N.Y. 10013 8/31/16 10/31/16

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary.

An abduction happen too me from Bronx County too Manhattan. I was told "the detective from 33rd just wanna ask you some question and you can go back and see the judge," on August 25, 2016. I was charge with Robbery 2nd on 8/26/16 as legal Aid society kept telling me not too go to the grand jury as Judge Jane doe ask off the record about the I-Card and set bail very high on me. On 8/30/16 legal Aid who served the people the grand jury papers for me too testify refuse to produce me for grand jury as Gordon ask me to take an A.D.A plea offer of 1 to 3 years, I refuse the offer as Gordon refuse too be my lawyer. Which gives the people more time as my due process was violated. On 8/31/16 I wasn't produce in front of a judge to tell my story as lawyer Gordon came in the holding pen with another lawyer and said "I reliving myself right now" as Mr. Buza was my new lawyer. Which looks like lawyer appointed 12 hours. On 9/1/16 I went to the grand jury and they ask me if Mr. Buza was my lawyer I stated "No" I was appointed 2 in legal Aid by the judge who you suppose to be in front of when he/she is being appointed an new lawyer. My due process was violated by Mr. Buza see exhibit 25 well legal Aid and judge Jane doe part: F See Exhibit 24th

Plaintiff third lawyer who was working along with the A.D.A ask the 18b Mr. Buza who text Ms. Sophia Khan A.D.A. "I'm standing here with the new 18b lawyer Micheal Hurwitz Esq we are about to go on record, He wants to know the plan." AS Mr. Buza stated "Easier for you two to discuss?" around 3:38pm see exhibit 2-11 The new 18b lawyer Micheal Hurwitz Esq ask for client name too be spell right as well for case to be dismiss & ROR both application denied. The 18b lawyer ask to produce plaintiff too the grand jury to testify as people shouldn't presented without producing plaintiff. see exhibit 2-11

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

I was abductive from Society on 8/25/2016 in Bronx County Court without seeing the judge.

I was anticipating to go in front of the grand jury on 8/30/2016 but was violated by Legal Aid Society Counsel Gordon Ludwig Esq.

On 9/1/2016 my grand jury proceeding was stop by 18b Mr. John Buza who never produce me in front of a judge when He was Appointed on 8/31/16.

VI. RELIEF

State briefly what money damages or other relief you want the court to order.

For all Legal lawyers that's appointed to defendants too not waived His/Her right to the grand jury after the papers have been served, unless Client Consent and sign off on it.

For All Lawyers Stop abuseing the Law of "people v. Marcus" which give the lawyer the right to violate client right not too go to the grand jury.

Plaintiff Due Process was violated on 8/25/2016 unlawful arrest and 8/30/16 legal Due Process violated by appointed lawyer's and A.D.A along with Judges; Jone doc's who place a very High bail on Client. Client 1, 4, 8, 6, 5, 14 Amendments has been violated by the Courts and 33pct, Plaintiff ask for \$1000 a day spend up in Riker's Island without Proper Due Process from the 33pct & Courts who knew no warrant was made for Abductions at Bronx County Court on 8/25/2016 at 11AM

STATEMENT OF FACTS

On August 25, 2016 at 265 East 161 St Bronx County N.Y. 10451. I TYQUAN HASKINS who had Court & was running one hour and half late. As 186 Bronx lawyer Seth Greisman # (914) 372-1065 Contact me as I let him know I was arriving late. When I made it too Court on the 4th floor outside of the Court house room. Stood three unmark Clothing Officers who rush me before I could reach the Courtroom door. I ask what was the reason for them too stop me from entering the Courtroom as I refuse to be place in handcuff. One officer stated "The Detective from 33pct just wanna talk to you and you can go back too Court and see the judge after you finishing answer his questions."

I ask the officers if I can see the judge first as they said "NO" and kept reaching for my hand to handcuff me too the rear. I ask unmark officer's John doe's "If I'm needed for questions why are you place handcuff on me?" As D.O.C Capt: Lynch came out of a Courtroom and threatening too mace me Cause I was refusing too be handcuff in the hallway as people could hear and see the abduction.

I was escorted out around 11AM by three unmark officer's as D.O.C Capt: Lynch assisted them walking me to the main entrance. When I arrive at 33pct Detective Adam Tegan #7192 who Clap his hand in joy as the unmark officers laugh along with Adam #7192 when I ask why I'm being treated as if I did a crime. Adam #7192 ask me too empty out my pockets when handcuff was taking off of me as detective took my two cell phones. I ask if he had and Search warrant as well & warrant to abducted me from Court.

Defective: Adam Tegan #7192 laugh at me and stated "You like the interception my boyz made on you?" I ask "Why yo. Couldn't Show me a Warrant for my arrest as well Why you couldn't wait until I see the judge?" Adam #7192 Stated "The Judge will let you go Cause truthfully me & my boyz don't have a Warrant for your arrest but an Id card was drop on you I could alway say that." I ask what was going on as Adam #7192 told me I'm being Charge with robbery in the second degree by an person who knows me. I ask for the person name Adam #7192 Stated a female name that I never heard before as he was taking my two Cell phones too use it against me as Stoling property.

My Due Process Rights Was Violated by 33pct three unmark office John does & det. Adam Tegan #7192 as they pick up my cell phone When my 186 lawyer [Seth Greisman # (844)-372-1665] Call. The Egregious misconduct done by the detective as my phones WAS taking from me as I was falsely lie too by the three unmark officers.

My 1, 5, 6, 4, 8, 14 Amendments was Violated by the N.Y.C 33pct who unlawful arrested me on 8/25/16 & unreasonable Search and Seizure; taking of property without due process; unreasonable force and deprivation of liberty without due process of law, which includes the right not to have Criminal Charges based on fraudulent evidence or false information." New York City 33 pct Detective:

Adam Tegan #7192 is free to fabricate false Confessions at will would make a mockery of the notion that Americans enjoy the protection of due process of the law and fundamental justice.

As I'm finger printed for Robbery in the second degree at 33pct as my property was taking from me and use by the 33pct Det. Adam #7192 as Stoling property two cell phones that's Samsun Galaxy white color in good condition:

See Exhibit "A" page "2" top page as the people state stoling,

(3)

On August 26, 2016 at 100 Centre St New York N.Y. 10013 at Courtroom AR3. I spoke with Legal Aid Gordon Ludwig ESQ who advice me to not go to the grand jury after I told him that my Constitution Rights was violated by NYC 33pct Det: Adam #7192. Legal Aid: Gordon Ludwig ESQ stated "The officer's Couldn't just take you from Court unless they had an warrant." As he told me that we will find out when we get in front of the judge as he ask me about the person that know me. I knew her by another name not the main name the Court use and officers use as I explain my story the Legal Aid: Gordon Ludwig ESQ agree to place me in front of the grand jury. I feel the Legal Aid: Gordon Ludwig ESQ wasn't going too tell the judge about my Rights being violated by 33pct who was egregious as they use my cell phone for stealing property and abducted me from Bronx County Court, without seeing the judge. see exhibit "A" page "3" & "4". On August 30, 2016 100 Centre St New York N.Y. 10013 at Counsel. visited area at "M.D.C" Court holding area. Legal Aid: Gordon Ludwig ESQ Didn't produce me in front of the grand jury as Gordon wanted me too take the A.D.A plea of 18 months which means the victim haven't come in the grand jury and A.D.A need more time to get the victim who is lying. I rejected the A.D.A offer and ask too be produce at grand jury as Legal Aid: Gordon Ludwig Stated "you don't take the 18 months I'm not your lawyer." I was drop on 8/30/16 by Legal Aid Gordon Ludwig ESQ who wanted me to take the A.D.A plea offer.

— TREBLE DAMAGES —

I was fool by the Legal Aid Society Gordon Ludwig ESQ who agree too take me and the day for me too testify I was not produce as well drop off the Legal Aid Society who supposed to help those who are innocent instead of forcing there Client take a prosecution offered plea. If Mr. Ludwig ESQ felt Sending me up north when I told him I didn't do the Criminal action they accuse me for. Why Represent me???

On August 31, 2016 100 Centre Street New York NY 10013. I had Court as I didn't see any judge at Part F as the Legal Aid Society lawyer: Gordon Ludwig ESQ walk in Smalling with another person who stated that he was my lawyer as I told him that I never release the Legal Aid Society Gordon Ludwig ESQ. Mr. John Buza 18b lawyer stated he will be my new lawyer as Gordon Ludwig didn't wanted to be my lawyer anymore. I was told by the new 18b lawyer John Buza if I take the stand at the grand jury I will received 7 years as the people offer me 2 to 4 years to not go too the grand jury. I rejected the people plea bargaining as 18b lawyer stated "I'll don't think it will be in your best interest to go too the grand jury but if you wanna go let me get the papers for you too sign." AS Mr John Buza late me know that he will bring me too the grand jury today 8/31/16 cause it a all day grand jury. AS Mr. John Buza inform me I should be testify in the afternoon which never happen as I was let down and lie to again by another lawyer. Two lawyers have show me "TEBLE, DAMAGES" AS I was told too come back on 9/1/16 by MDC who told me I wasn't indicted but I was coming back tomorrow.

On September 1, 2016 100 Centre Street New York N.Y. 10013 I went to the grand jury and let the people know my Due process was violated as well the A.D.A ask if John Buza 18b lawyer was my lawyer. I said "No" that I was appointed an Legal Aid Society lawyer not an 18b lawyer. That I never was in front of a judge to be appointed an 18b lawyer like Mr. John Buza. 18b lawyer John Buza stop my proceeding at the grand jury which is a violation too me cause I told the truth that the judge never panted as well I wasn't produce in front of an judge to be appointed John Buza who was bought in by the Legal Aid Society lawyer Gordon who wanted me too fake the A.D.A plea bargaining. ON 8/30/16.

On September 1, 2016 Centre Street New York N.Y. 10013. I was taking out of the grand jury by 18b lawyer Mr. John Buza who felt violated cause I told the truth whe A.D.A ask if he was my lawyer. 18b lawyer Mr. Buza said we going down too Part: F So the judge can pionted you a new lawyer. I went in front of the judge and was appointed an 18b lawyer Micheal Hurwitz ESQ who ask the judge to R.O.R ~~cause~~ I never fired any lawyer as well ~~tell~~ them to waived my 180.80 & 30.30 at any time. Judge denied application as 18b lawyer Hurwitz ESQ ask for case to be dismiss cause I never told John Buza to stop my proceeding in the grand jury as well on 8/30/16 I never ask Legal Aid Society Gordon Ludwig to waived my right to not too testify at the grand jury as well my 180.80 & 30.30. Application was denied by Judge see Exhibit "E" page "7." 18b lawyer ask the people too not present the case to the grand jury without me having an opportunity to testify in the grand jury. AS the A.D.A Produce the case without me being able to testify as I was indicted without finishing my grand jury testify after 18b Mr. John Buza Stop my proceeding and waived my rights without my consent on 9/1/16.

The reason 18b John Buza Stop my proceeding at the grand jury was becaus A.D.A asked was attorney John Buza my Attorney at the time. I said "No" to the A.D.A which I told the A.D.A my Constitutional Rights is being violated by the lawyers & A.D.A as well the 33pt officers. John Buza got mad at me and took me too the hallway as 18b lawyer stop the try testimony at the grand jury cause I'll was ask if he was my lawyer and I stated that the judge never produce me too appointed Mr. John Buza ESQ as my lawyer. He was appointed by another lawyer who didn't care about my Due process or rights as I was being violated by the Legal Aid & Court's A.D.A and Judge.

(5)

On September 19, 2016 100 Centre Street New York N.Y. 10013 2nd Courtroom Part: 71 by Judge: Ms. Ward who had arraign me on the indictment by the people on 9/1/16 as the foreman signature wasn't there to be shown by the people on 9/1/16 as I was indicted.

18b lawyer Micheal Hurwitz didn't state to the Judge: Ms. Ward I haven't got too testify at the grand jury as well Micheal Hurwitz didn't place an application too reduce Bail after hearing Robbery second drop to Robbery in the third^{3rd} which is an non-violent charge. 18b lawyer Micheal Hurwitz didn't even attempted to put in a motion in front of the Judge: Ms. Ward who kept bail at a high \$15,000, over \$15,000 as I was told to stay away from victim if I bail out. As my 18b lawyer Micheal Hurwitz never asked or put in an application for me to be produce in the grand jury as well Bail Reduction no 190.50 or 530.40 was enter as I felt violated and ready to give up and cop out to go up state cause the new lawyer ask for me ~~that~~ go in front of the grand jury on 9/1/16 but the A.D.A disregard the lawyer and Court order as my Due process was violated.

My next Court date was on October 31, 2016 as I was led out by the Court Officer. 18b lawyer who failed too put in a motion too go in front of the Judge and to Reduce my bail is signs of I.A.C. as non of my request was answer as the 18b lawyer put in his on motion without my consent. Which I was asking to be go in front of the grand jury until this day on as the people waived me not to go. Micheal Hurwitz put in motion to go over the grand jury minutes as I was asking to go in front of the grand jury. Micheal Hurwitz never response too my motion that I send from Riker's Island 190.50 246 530.40.

On October 31, 2016 100 Centre Street New York NY 10013 at Courtroom Part: 71 Judge: Ms. Ward who denied my Bail motion as she told me out of four motion I send her she received and entertain one which was an alternative sentence for non-violent crimes. As Ms. Ward told me she isn't granting the motion cause my case is Robbery in the 3rd and isn't good for an inpatient program. I was asking for an inpatient drug program and was denied by the Honorable Judge: Ms. Ward who arraign me on grand jury indictment on 9/19/16 as the charge was drop to Non-Violent charge.

My next court date was told to me in front of the judge: Ms. Ward 12/5/16 as 18b Micheal Hurwitz didn't asked for a bail or ask the judge why I couldn't be accept to an inpatient drug program? The lawyer was acting as if he was scare to advocate on my behalf. The judge: Ms. Ward talk and the people as well my lawyer will just listen.

On December 5, 2016 100 Centre Street New York NY 10013 at Courtroom Part: 71 as I was told to get ready for trial know as pre-trial hearing as I was taking out of the courtroom after Micheal Hurwitz made two application request on my behalf one for Bail Reduction as the judge denied it and I ask for the grand jury as Micheal Hurwitz didn't ask the Judge Ms. Ward about me having the opportunity to go in front of the grand jury. I feel as if my lawyer is doing his on thing as well he never until this day on tell me what motion he's putting in as the A.D.A is telling Micheal Hurwitz to get me to take the 2 to 4 offer. Ever since I'll been indicted on the 9/19/16 18b Micheal Hurwitz keep on telling me on ever appearance to court about the A.D.A offer 2 to 4.

Since 9/1/16 Micheal Hurwitz haven't act as a real lawyer as he keep on offering the A.D.A Plea 2 to 4 for me too Cop out at Court room Part. 71 in front of Judge: MS. Ward who is doing my pre trial hearing and I'm told she will do my trial by Micheal Hurwitz who isn't Communicating with me. The No Communication between me and my lawyer who isn't responding too my motion as well the A.D.A phone call to produce me at the grand jury. See Exhibit "G" the people opposition to the Motion 18b lawyer Micheal Hurwitz who put in to deduct time out of my 30.30.

I being told every time I arrive too Court to take the 2 to 4 Offer by my 18b lawyer Micheal Hurwitz who haven't Challenge the people who indicted me without producing me too the grand jury on the 9/1/16. AS well the lawyer didn't bring it up that two lawyers have Stop my 180.80 & 30.30 without my consent. the 18b lawyer Micheal Hurwitz isn't working on my behalf as the pre trial Hearing don't have Isaacson Hearing from the last two lawyer who Ineffective Assistance Counsel which should of been mention as well raised in Court on December 5, 2016.

TREBLE DAMAGES is showing on all three lawyers One Legal Aid Society: Gordon Ludwig Esq and the Second 18b John Buzza as the Third 18b Micheal Hurwitz who play a major roll every time I arrive to Court he is offering the A.D.A plea bargaining 2 to 4. 18b Micheal Hurwitz never had a video conference as well respond to my motions I put in.

All three lawyers never responded to my request too my Rights being Violated by the 33pct Det: Adam #7192 who Took me off the Street with out a warrant and Prosecutorial Continue the Misconduct

LEGAL ARGUMENT

All three lawyers failed to allege police misconduct that have violated defendant Constitutional Rights; AS all lawyers that listen too defendant Complaint about his abduction at Bronx County Court. Defendant never failed to allege police misconduct as all three lawyers took notice of defendant stating his Due process was violated "ISAACSON HEARING" Deveraux v. Abbey/Geter v. Fortenberry

I.A.C: AS all three lawyer kept on telling defendant to take the A.D.A plea offer Legal Aid Society lawyer refuse too be defendant lawyer cause Client rejected 1 to 3 18 month offer. Both 18b lawyers offer defendant the A.D.A offer of 3 to 7 Mr John Buza said as he relieve himself on 9/1/16 by stopping defendant grand jury proceeding. 18b Micheal Hurwitz offer defendant 2 to 4 years on 9/19/16 10/31/16 12/05/16 as client rejected offer "Lafley v. Cooper, 132 S Ct. 1376 (2012):
"People v. Thomson, 46 A.D.3d 939, 940 (3d Dept. 2007)

TREBLE DAMAGES

8/26/16 Legal Aid Society Gordon Ludwig ESQ lie too Client & the Judge as the prosecutor work with false evidence and fabricated story by Officers and Victim as Legal Aid Gordon work with the A.D.A by waiving my 180.80 & 3030 without my consent. AS well 18b John Buza who have A.D.A cell number as they text back an forth too each other about the plain they have on 8/31/16. 18b Micheal Hurwitz ask on 9/1/16 the 18b John Buza who text the A.D.A on the statement of Mr. Hurwitz who stated "Whats the plain" which show "Treble damage

See Exhibit "A"

My Constitution's Amendments has been Violated by the Judges & Lawyer's Amendments, 5, 6, 8, 14 violated.

① On 8/25/2016 I was abductive from 265 East 161 Street Bronx N.Y. 10451 4 floor by three unmark NYC 33pct officer's who didn't have a warrant or Search warrant to handcuff me before I could see the Judge in Bronx County. As D.O.C Capt assisted them walking me out of Court.

② 33pct Detective Adam Tegan #7192 stated to me around 11:30AM "You like the interseptions that was made by my boyz?" As my property was remove and phones wasn't Vocher as Tegan #7192 stated my cell phones was being use as stolen property in the case.

③ On 8/26/2016 I was call to ~~Or~~ arraignment around 11AM by Judge # Joanne Watters, who ask about the I.D. too the people as well ask what took too long as the D.A. stated "Nothing".

Joanne Watter Judge who knew there wasn't no warrant or I.D. drop on me, Continue too process the case knowing I was abductive from Bronx Criminal Court # 8/25/16. Judge: Joanne Watters, Who favor the A.D.A by placing bail at \$15,000 knowing the people ask for 3000 that's half of what the A.D.A ask for Violating my Rights.

Abduction from Court See Proceedings
Page "4" as Judge ask about the delay
and Legal Aid states plaintiff was at Court.

The People lies on there V.D.F
Stating Plaintiff was lock up in manhattan
See People Voluntary
Disclosure Form Attach in the back.

EXHIBIT A

The Peoples Voluntary disclosure form
states Arrest 2207 Amsterdam Avenue
11:45 AM 8/28/16 See Attach P.V.D.F as well
No warrant box check, on page "4"

1 CRIMINAL COURT OF THE CITY OF NEW YORK
2 COUNTY OF NEW YORK: PART. APAR1

3 -----X

4 THE PEOPLE OF THE STATE OF NEW YORK : DOCKET NO.

5 :
6

7 -against- : 2016NY051176

8 TYQUAN HASQUINS,

9 Defendant.

10 -----X

11 100 Centre Street
12 New York, N.Y. 10013
13 AUGUST 26, 2016

14 H O N O R A B L E:

15 JOANNE WATTERS,

16 Judge.

17 A P P E A R A N C E S:

18 FOR THE PEOPLE:

19 CYRUS VANCE, JR., ESQ.
20 DISTRICT ATTORNEY
21 NEW YORK COUNTY
22 BY: CHRISTOPHER MILLS, ESQ.

23 FOR THE DEFENDANT:

24 THE LEGAL AID SOCIETY
25 45 THOMAS STREET
NEW YORK, NEW YORK 10013
BY: GORDON LUDWIG, ESQ.

SHARON N. MORRISON
OFFICIAL COURT REPORTER

PROCEEDINGS

1 THE COURT OFFICER: From the front row, docket
2 ending 176, Tyquan Hasquins. Defendant is charged with
3 Robbery in the Second Degree, two counts of Grand Larceny in
4 the Fourth, and Criminal Possession of Stolen Property in the
5 Fourth, presworn affidavit.

6 Counsel, waive the reading, not the rights?

7 MR. LUDWIG: So waived.

8 THE COURT OFFICER: People.

9 MR. MILLS: People are serving felony Grand Jury
10 notice, inquire as to cross.

11 MR. LUDWIG: I'm serving cross Grand Jury notice on
12 behalf of my client.

13 MR. MILLS: Your Honor, the People are serving a
14 Wiggins letter. The People intend to present this case to
15 the Grand Jury in room 907 of One Hogan on Tuesday, August
16 30th at 10:00a.m.

17 The People are also requesting a temporary Order of
18 Protection in this case. The People are reserving both
19 statement and identification notice and requesting bail in
20 the amount of \$30,000. The defendant here is a predicate
21 felon for a 2012 Attempted Burglary in the Second Degree.
22 The defendant also has an open felony strangulation case and
23 an open robbery. The defendant also has an extensive
24 misdemeanor criminal history including 24 misdemeanor
25 convictions of which includes an Assault in the Third Degree,

PROCEEDINGS

1 Attempted Assault in the Third Degree, Resisting Arrest, CPW
2 Contempt. The defendant has nine prior bench warrants.

3 In this case the defendant grabbed a friend's cell phone
4 with debit card and cash and pushed the complaining witness
5 to the ground. For these reasons, we are requesting bail in
6 the amount of \$30,000.

7 MR. LUDWIG: Judge, this is clearly the least of his
8 problems, again, given his record. This case is going
9 nowhere. I doubt very seriously that the complaining witness
10 is going to show up. The parties are known to each other.
11 They have a relationship. The complaining witness has made
12 this up as a ploy to get my client in trouble because of a
13 personal matter between the two of them. And given the
14 nature of their relationship, I doubt very seriously that
15 she's going to show up to court.

16 I understand the Court is going to set some bail. I
17 assume that on the 180.80 day he will be released. I do,
18 however, want to put on the record that, while I have served
19 cross Grand Jury notice, I've had a conversation with my
20 client. He is insisting on going into the Grand Jury should
21 this case proceed. I, as an attorney, have advised him that
22 I make the decision as to whether he goes into the Grand
23 Jury. He rejects that. At this point it's premature, but I
24 want the Court to be aware of the situation should I withdraw
25 cross Grand Jury notice on the one 180.80 day.

PROCEEDINGS

1 THE COURT: Okay. Thank you.

2 And what is the reason for the delay from incident to
3 the arrest? This is alleged to have occurred July 29th. Do
4 you have any information? *8/25/2016*

5 MR. LUDWIG: He was arrested in court *yesterday.*

6 MR. MILLS: Your Honor, it does appear that there
7 was no delay in the report *NO WARRANT* from what I can see; but it looks
8 like there was an issue with defendant wasn't there, and then
9 they dropped an I-card, and then just apprehending him. He
10 was arrested *8/25/16* yesterday in the Bronx. *8/25/2016* *abductive from*
Court didn't see judge or warrant

11 THE COURT: Mr. Hasquins, while this case is
12 pending, you're to have no contact with Jenalisa Feleciano,
13 otherwise you're going to be arrested. No contact means in
14 person, by phone, by mail, e-mail, text, Twitter, Facebook,
15 any way that you can possibly imagine, including sending
16 messages to her through other people. No third-party
17 contact, otherwise you will be rearrested. Do you understand
18 that?

19 THE DEFENDANT: Yes, ma'am.

20 THE COURT: The case is adjourned to Part F for
21 August 31st. Bail is set in the amount of \$15,000 insurance
22 company bail bond over \$15,000 cash. *Too high 8, Amendment*

23 MR. LUDWIG: Judge, medical attention, please.

24 (CONTINUED ON NEXT PAGE.)

25

PROCEEDINGS

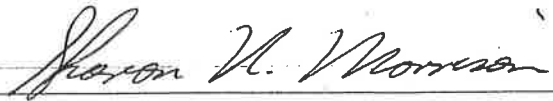
1 THE COURT: I'll mark that. Thank you.

2 *****

3 This is certified to be a true and accurate transcript
4 of the above proceedings recorded by me.

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SHARON N. MORRISON
OFFICIAL COURT REPORTER

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See Exhibit "B"

- ④ On 8/31/2016 Judge: Charlotte Davidson who knew that D.O.C have produced me as the Judge: Charlotte Davidson didn't not before the Courts, Produced defendant for reassign Counsel.
- ⑤ On 8/31/2016 I.A.C as an 18b lawyer was call too be appointed without defendant consent who wasn't produce in front of the Court to tell the Judge: Charlotte Davidson his story as legal Aid wanted defendant to take an D.A. ple to not testify in front of the grand jury, or legal Aid will retire himself.
- ⑥ On 8/31/2016 Judge: Charlotte Davidson chose to waive defendant 180.80 & 30.30 CPL as the Order protection was extended to February 26, 2017 with out defendant being produced in Court to sign as well to be appointed an new lawyer. Second call defendant who wasn't produced before the Court on his 180.80.
- ⑦ Judge: Charlotte Davidson who knew defendant was produce on 8/31/16 as lawyer and 18b Counsel have delay defendant 30.30 & 18-80 as defendant who suppose to be produce in the grand jury on 8/30/16. As Judge: Charlotte Davidson chose to waive defendant appearance in the Court as defendant 180.80 was violated by Judge: Charlotte Davidson who never produced defendant who never ask for a new lawyer as the Judge took the lawyer side without hearing the defendant side. Violations too the Courts

Plaintiff Due Process violated
by lawyer ESQ legal Aid who agree
to waived client 80.80 without his consent
for an A.D.A plea offer that legal Aid
call an generous offer on page "2"

AS Plaintiff wasn't produce a +
all on 8/31/16 violation to Due Process.
56, 14 Amendments.

EXHIBIT B

1 CRIMINAL COURT OF THE CITY OF NEW YORK
2 COUNTY OF NEW YORK: PART F

3 -----X
4 THE PEOPLE OF THE STATE OF NEW YORK,
5 -against-

DOCKET NO.
03662/2016

6 TYQUAN HASQUINS,

7
8 DEFENDANT.
9 -----X

10 100 Centre Street
11 New York, New York 10013
12 August 31, 2016

13 B E F O R E:

14 THE HONORABLE CHARLOTTE DAVIDSON, JUDGE.

15 A P P E A R A N C E S:

16 FOR THE PEOPLE:
17 CYRUS VANCE JR., ESQ.
18 DISTRICT ATTORNEY, NEW YORK COUNTY
19 One Hogan Place
20 New York, NY 10013
21 BY: BENJAMIN LEVIN
22 CHRISTOPHER DEY
23 Assistant District Attorney

24 FOR THE DEFENDANT:
25 Legal Aid Society
49 Thomas Street
New York, NY 10013
BY: GORDON LUDWIG

Law Office of John Buza P.C.
20 Vesey Street
New York, NY 10007
BY: JOHN BUZA

DANA COGLIANO
OFFICIAL COURT REPORTER

PROCEEDINGS

BRIDGE OFFICER: Sixteen. Calendar number 16, prison matter, Tyquan Hasquins.

The defendant is produced, but not before the Court.

Violation 5, 6, 14 Amendments Judge not producing defendant.

An order of protection is in effect until

February 26th of 2017.

MR. LUDWIG: Legal Aid Society by Gordon Ludwig for Mr. Hasquins.

Judge, I am going to ask to be relieved. But, first, I want to make a record as to what has happened with this case.

180.80 was originally at 11:45 a.m., this morning. The day before ~~yesterday~~ *8/24/16* I was contacted by the assigned assistant, who indicated that they had an offer for my client of one and a half to three on an SCT.

And my client, being a violent predicate, facing a minimum of seven years on this case, I agreed to waive 180.80 until Thursday for me to have an opportunity to go talk to my client about what I considered a generous offer. *9/1/16 Two days* ~~Violations defendant due process and Judge see it.~~

Inasmuch as, based on my conversations with him, I was going to withdraw his cross Grand Jury notice this morning and not permit him to testify, as this is my call, in terms of a strategic maneuver by his lawyer.

Mr. Hasquins became extremely, extremely

PROCEEDINGS

8/30/16

1 perturbed, borderline violent yesterday. So I had the
 2 on-call 18B come in today, anticipating that he was going
 3 to ask for a new attorney or to proceed pro se on the
 4 matter.

5 So, to be clear, I would not put him into the
 6 Grand Jury. He's asking for another attorney. I join in
 7 that application. I have permitted to the District
 8 Attorney's Office to waive 180.80. But I, at this point,
 9 will only waive until 11:45 a.m. tomorrow, because I agreed
 10 to waive 180.80 for 24 hours.

11 So I believe that the Court should hold the People
 12 to the 11:45 a.m. time tomorrow. And I would ask to
 13 appoint 18B to make whatever strategic decisions he has to
 14 make. We have 18B here, Judge.

15 THE COURT: Legal Aid Society is relieved, and 18B
 16 is assigned. *Judge violated defendant by not producing him in front of courts.*

17 MR. LUDWIG: Thank you, Judge.

18 *Judge talking* At this point, cross Grand Jury remains in
 19 *violations case should be dismiss for defendant not*
 20 *effect. And I'll leave all other decisions up to new*
 21 *being produce as well pvc process violated on 8/30/16 by Legal Aid*
 22 *counsel*

21 THE COURT: Should we second call it or put it on
 22 for tomorrow?

23 MR. BUZA: Judge, I'm here.

24 THE COURT: Okay. Great. Do you want to second
 25 call the case today or put it on for tomorrow?

PROCEEDINGS

1 MR. BUZA: Well, I don't know --

2 MR. LEVIN: We are likely presenting today. *8/31/16*

3 MR. BUZA: So if they're presenting today, I would
4 ask for a second call. He wants to testify so --

5 THE COURT: All right. Second call.

6 * * * * *

7 BRIDGE OFFICER: Recalling calendar number 16,
8 prison matter, Tyquan Hasquins.

9 The defendant is produced, not before the Court.

10 The defendant has a Department of Corrections
11 hold. *Violations defendant due process 5, 6, 14 Amendment*

12 MR. DEY: Your Honor, it appears that this case
13 was second called but no date was set. My understanding
14 is 180.80 is tomorrow, as defense counsel waived until
15 11:45 a.m. tomorrow. So I ask that we adjourn this to
16 tomorrow, 9/1.

17 (Transcript continued on the following page.)

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PROCEEDINGS

1 THE COURT: Is his new counsel here?

2 BRIDGE OFFICER: Not at the moment.

3 THE COURT: We can put it on for tomorrow.

4 MR. DEY: Thank you, Judge.

5 THE COURT: 9/1, in Part F, for Grand Jury action,
6 on consent. And that's a waiver of 180.80 and 30.30.

7 * * * * *

8 CERTIFIED TO BE A TRUE AND ACCURATE
9 TRANSCRIPT OF THE ABOVE PROCEEDING.

10 

11 DANA COGLIANO
12 OFFICIAL COURT REPORTER
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See Exhibit "E"

⑧ On 9/1/2016 John Buza who was appointed to me by the Legal Aid Mr. Ludwig on 8/31/16 and told me he was going to take me to the grand jury that was an All day thing on 8/31/16 John Buza told me, AS I wasn't produce on 8/31/16 as 9/1/2016 I was produce to the Grand Jury as I told the people that the lawyer next to me isn't my lawyer. That I was appointed a Legal Aid by an judge not a lawyer. AS the 18b lawyer John Buza got mad and stop the testimony and brought me down to part F Courtroom to see the judge to get appointed a new lawyer.

⑨ On 9/1/2016 Honorable Charlotte Davidson, Judge. Who knew defendant haven't actually testify as ADA Sophia Khan stated as 18b John Buza agreed with Sophia Khan to waive defendant 180.80 until next lawyer makes a decisions in front of me & new lawyer we was blacklisted.

⑩ On 9/1/2016 Honorable Charlotte Davidson, Judge Assigned lawyer who knew my request to dismiss case for first lawyer not producing me to the Grand Jury on 8/30/16 a Legal Aid wanted me to take a D.A Ple bargain to not testify on 8/30/16. The 18b lawyer never produce on 8/31/16 too the all day Grand Jury as he got mad at me for telling the truth. The New 18b lawyer sign on 9/1/16 was asking about my last name and made two application one for ROR & another for case too be dismiss. AS Judge denied them. lawyer ask for defendant too testify on 9/1/2016

MISSING Page "6"

Page "9" The people
refuse too turn over what the
Judge had said to me on the 9/11/16

EXHIBIT E

September 1, 2016